

EXHIBIT 6

Filed Under Seal

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GOOGLE LLC,

Plaintiff and Counter-defendant,

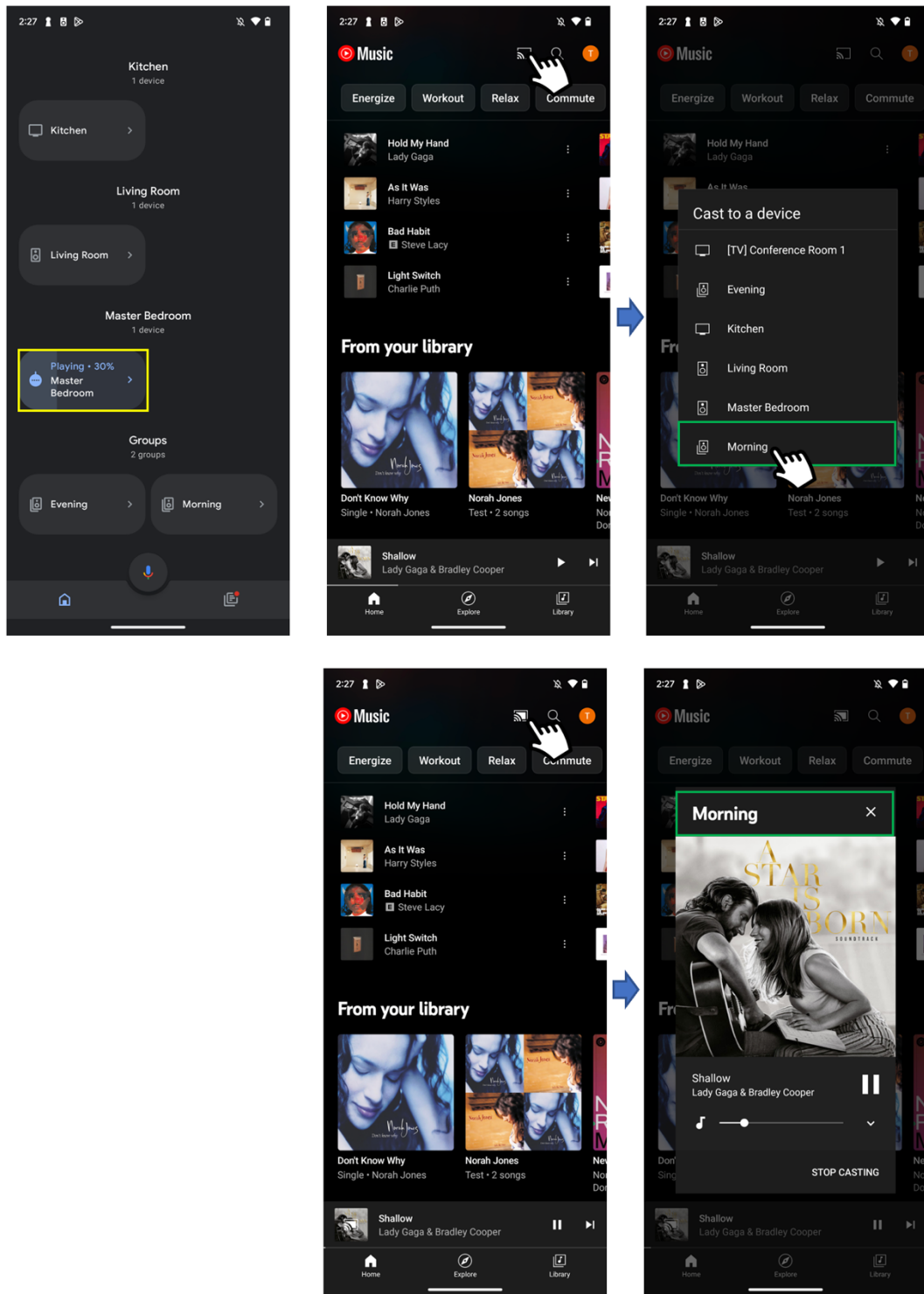
v.

SONOS, INC.,

Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA
Related to Case No. 3:21-cv-07559-WHA

**OPENING EXPERT REPORT OF
DR. KEVIN C. ALMEROOTH**



As shown in the first screenshot of the Google Home app, at the time the “Morning” group was launched using the YouTube Music app, the “Master Bedroom” player was engaging in active playback. I also observed this audibly. As shown in the remainder of the screenshots of the

1 YouTube Music app, after selecting the “Morning” group from the list of available devices, the
2 Cast icon at the top of the YouTube Music GUI turns to solid white and, in the last screenshot, the
3 YouTube Music App indicated that the “Morning” group had been launched. I also observed that,
4 after the “Morning” group was launched, the “Kitchen” and “Master Bedroom” players both began
5 playing the same song and it sounded to me as though the “Kitchen” and “Master Bedroom”
6 players were outputting audio in synchrony with one another.

7 236. This eighth set of screenshots shows an example where the “Evening” speaker
8 group was selected for launch via the YouTube Music app in a scenario where the “Kitchen” and
9 “Master Bedroom” players were outputting audio in synchrony with one another in accordance
10 with the “Morning Group” and the “Living Room” player was operating in standalone mode and
11 not engaging in active playback:

1 speakers between the Applets. For example, the “Garden” Applet was built using the Sonos
2 “Living Room” and “Kitchen” speakers, while the “Evening” Applet was built using the Sonos
3 “Living Room” and “Master Bedroom” speakers.

4 813. As also previously explained, each speaker in an Applet may be set up to play back
5 the same song (e.g., the “Naturally” song) as the other speakers in that Applet.

6 814. In this regard, the IFTTT Applets are technologically comparable to the “zone
7 scene” technology claimed in the ’885 and ’966 Patents. That is, these Applets can be used to
8 create and save a predefined group of playback devices, such as speakers, that can later be invoked
9 to cause such devices to playback the same song. These saved groups can also be named according
10 to a common theme, such as “Garden,” “Morning,” “Afternoon,” and “Evening.” Moreover, the
11 Applets allow for these predefined groups to include overlapping playback devices and to be
12 capable of playing back the same song.

13 815. It should be understood, however, that the IFTTT Applets do not perform each and
14 every limitation of the claims of the ’885 and ’966 Patents and do not provide the full scope of
15 advantages explained above. As one non-limiting example, these Applets do not enable the
16 creation of groups of speakers that are “configured for synchronous playback of media” when
17 invoked, as required by limitations 1.6 and 1.7 of Asserted Claim 1 of the ’885 Patent and
18 limitations 1.5 and 1.7 of Asserted Claim 1 of the ’966 Patent. As such, unlike the ’885 and ’966
19 Patents’ claimed technology, the smart speaker groups created via these IFTTT Applets do not
20 provide the advantage of synchronous audio playback because the smart speakers in a group
21 created and invoked with an IFTTT Applet would have unwanted echo (e.g., echo caused by clock
22 drift between the smart speakers and/or echo caused by differences in the playback start time of
23 the audio on each smart speaker).

24 816. Nevertheless, it is my opinion that, while the technology incorporated into the
25 IFTTT Applets may be inferior to the claimed technology of the ’885 and ’966 Patents, the IFTTT
26 Applets are technologically comparable to the claimed “zone scene” technology of the ’885 and
27 ’966 Patents.

28 **XIX. DEMONSTRATIVES**